

ALBERT C. COATES and  
NORA A. COATES, his wife

Plaintiffs

VS.

ROSA HENDERSON AND THE UNKNOWN  
HEIRS OF ROSA HENDERSON

Defendants

\* NO. 76E CIVIL  
\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* FREDERICK COUNTY,  
\* MARYLAND

\* \* \* \* \*

COMPLAINT TO QUIET TITLE

Albert C. Coates and Nora A. Coates, his wife, Plaintiffs, by their attorney, John H. Tisdale, sue Defendants and say that:

1. The Plaintiffs are in possession of a parcel of real property in the Petersville Election District, Frederick County, Maryland, situated on the south side of former U.S. Route 340, in the town of Petersville, Frederick County, Maryland.

2. The Plaintiffs are in possession of the above described real property under color of title by a deed from Cora Gretchen Somerville, Winifred Eugenia Eubanks, Arthur L. Eubanks, Helen A. Owins and Henry Owins, by a deed dated 30 September 1952, and recorded among the Land Records of Frederick County, Maryland, in Book 508, page 7, a copy of which is attached hereto as Exhibit 1.

3. Plaintiffs' title is disputed as shown by the following facts contained in the deed which is Exhibit 1 hereto:

A. The deed recites that Josephus Carne and Mary M. Carne, his wife, conveyed the subject real property unto Jane Henderson Allen, for her life, and then to John Henderson, Rosa Henderson and Daisy Henderson.

B. The deed contains a recital that John Henderson and Daisy Henderson predeceased Jane Henderson Allen and were unmarried, intestate and without issue.

C. The deed contains no record of the death of Rosa Henderson or any conveyance of her interest in the subject real property.